

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA, :
 :
 Plaintiff, : Case No. 3:15-CR-148
 vs. :
 :
 WILLIAM M. APOSTELOS, : Judge Thomas Rose
 :
 Defendant. :

UNOPPOSED MOTION TO MODIFY BOND TO ALLOW TRAVEL

Now comes the Defendant, WILLIAM M. APOSTELOS, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of bond allowing him to visit his mother at The Sanctuary at 10 Wilmington Place Retirement Community, 10 Wilmington Avenue, Dayton, Ohio on Sunday, March 27, 2016 from 2:00 p.m. until 4:00 p.m., to celebrate Easter. Defendant is willing to comply with any additional conditions that the Court may require. Assistant United States Attorneys Brent Tabacchi and Alex Sistla have no objection to this request; United States Pretrial Officer Kelvin Gover also has no objection to this request.

Respectfully submitted,

DEBORAH L. WILLIAMS,
FEDERAL PUBLIC DEFENDER

s/F. Arthur Mullins
F. Arthur Mullins (0080483)
Assistant Federal Public Defender
One Dayton Centre, Suite 490
1 South Main Street
Dayton, Ohio 45402
(937) 225-7687

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Brent Tabacchi, Assistant United States Attorney, by electronic filing, this 24th day of March, 2016.

s/F. Arthur Mullins _____
F. Arthur Mullins

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Attorney for Defendant
William M. Apostelos